

EXHIBIT 20

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

ELLEN GERHART, ELISE GERHART,	:	
ALEX LOTORTO, and ELIZABETH	:	
GLUNT,	:	
Plaintiffs,	:	No.: 1:17-CV-1726-YK
	:	
v.	:	
	:	(Judge Kane)
ENERGY TRANSFER PARTNERS, et al.	:	
	:	
Defendants.	:	JURY TRIAL DEMANDED
	:	

**DEFENDANT NICHOLAS JOHNSON'S OBJECTIONS AND RESPONSES
TO PLAINTIFFS' SUPPLEMENTAL REQUESTS FOR PRODUCTION OF
DOCUMENTS**

Defendant Nicholas Johnson (“Answering Defendant”), by and through his counsel, Siana Law, LLP asserts the following Objections and Responses to Plaintiffs’ Supplemental Request for Production of Documents as follows:

REQUESTS

1. Any “Non-disclosure agreement” or any other document which forms the basis of your refusal to answer questions during your deposition.

OBJECTION: Answering Defendant objects to this Request to the extent that it seeks any information beyond the Mariner East 2 project. As such, any “non-disclosure agreement” not related to Mariner East 2 is not relevant to the claims or defenses and is not proportional to the needs of the case.

RESPONSE: Subject to and without waiving these objections, and to the extent Request No. 1 is not objectionable, Answering Defendant did not enter into a

“non-disclosure agreement” or any other similar agreement pertaining to his publications regarding his work on the Mariner East 2 project.

2. All copies of your contact information for Robert Rice’s, including specifying when any piece of information was current.

RESPONSE: See attached document Bates Stamped as NJ000069 providing Robert Rice’s contact information which was current as of July 2021.

3. All copies of direct messages sent to PA Progress via any platform.

RESPONSE: See attached documents Bates Stamped as NJ000021-60. By way of further response, Answering Defendant no longer has access to the PA Progress Facebook page and is, therefore, unable to screenshot the entirety of all direct message conversations. The attached screenshots were taken prior to litigation.

4. Any contract or other writing setting forth any agreement between You and Cedar Fork Partners not already provided by Cedar Forks Partners.

OBJECTION: Answering Defendant objects to this Request to the extent that it seeks information beyond the Mariner East 2 project. As such, any “non-disclosure agreement” not related to Mariner East 2 is not relevant to the claims or defenses and is not proportional to the needs of the case.

RESPONSE: None.

5. Any and all documents which you contend support the assertions made in the video to which a link is provided in Paragraph 160 of the Second Amended Complaint.

RESPONSE: See attached documents Bates Stamped as NJ000061-68 and <https://www.youtube.com/watch?v=YeCCzbGdbJ8> (The Bridge with Kira, Live From Camp White Pine).

SIANA LAW

Date: March 1, 2022

By: /s/ Christopher P. Gerber
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CERTIFICATE OF SERVICE

The undersigned counsel certifies that on this day a true and correct copy of the foregoing Defendant Nicholas Johnson's Objections and Responses to Plaintiff's Supplemental Requests for Production of Documents was served via ECF and/or first-class mail, addressed to the following:

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Date: March 1, 2022

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